

## APPLICATION GRANTED SO ORDERED A January VERNON S. BRODERICK U.S.D.J. 2/20/2024

## VIA ECF AND ELECTRONIC MAIL

Honorable Vernon S. Broderick United States District Judge, SDNY 40 Foley Square New York, New York 10007

Re: United States v. Zukeila Plaza, 22 Cr. 142 (VSB)

Dear Judge Broderick:

We respectfully write in connection with the upcoming surrender of Zukeila Plaza on Friday, February 23, 2024. Ms. Plaza has been designated to FPC Alderson, which is located in rural West Virginia. Ms. Plaza will be surrendering prior to 2:00 p.m. on Friday.

In the Court's order of January 24, 2024, the Court authorized removal of Ms. Plaza's electronic monitoring device by Pretrial Services one day prior to her surrender (which would be February 22). We respectfully write to request that the Court permit the electronic monitor to be removed at the discretion of Pretrial Services beginning tomorrow, February 21. Ms. Plaza is finalizing travel plans—which will either require a flight or Amtrak—and she will have to leave for West Virginia by Thursday, February 22 to arrive on time. Accordingly, her electronic monitor would need to be removed more than one day in advance. Prior to any removal, Ms. Plaza will provide Pretrial Services with proof of her travel tickets and hotel reservation. Counsel has been working with Pretrial Services who consent to this request. The Government advised counsel that it defers to Pretrial Services on this request.

We appreciate the Court's consideration of this application (and thank it for its prior orders that have facilitated Ms. Plaza's surrender process).

Respectfully submitted,

/s/ John Zach
John T. Zach

Copies to: AUSA Wright (via ECF) Intensive Supervision Specialist Francesca A. Piperato (via email)